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14 Attorneys for Plaintiff,
15 Douglas Lee

16 UNITED STATES DISTRICT COURT
17 FOR THE DISTRICT OF ARIZONA

18 Douglas Lee,

19 Plaintiff,

20 vs.

21 Virtuoso Sourcing Group, LLC,

22 Defendant.
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Case No.:

COMPLAINT

JURY TRIAL DEMANDED

1 Plaintiff, Douglas Lee (hereafter “Plaintiff”), by undersigned counsel, brings
2 the following complaint against Virtuoso Sourcing Group, LLC (hereafter
3 “Defendant”) and alleges as follows:
4

5 **JURISDICTION**

6 1. This action arises out of Defendant’s violations of the Fair Debt
7 Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).
8

9 2. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d) and 28
10 U.S.C. § 1331.
11

12 3. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b), where
13 the acts and transactions giving rise to Plaintiff’s action occurred in this district and/or
14 where Defendant transacts business in this district.
15

16 **PARTIES**

17 4. Plaintiff is an adult individual residing in Laveen, Arizona, and is a
18 “person” as defined by 47 U.S.C. § 153(39).
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20 5. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1692a(3).

21 6. Defendant is a business entity located in Glendale, Colorado, and is a
22 “person” as the term is defined by 47 U.S.C. § 153(39).
23

24 7. Defendant uses instrumentalities of interstate commerce or the mails in a
25 business the principle purpose of which is the collection of debts and/or regularly
26 collects or attempts to collect debts owed or asserted to be owed to another, and is a
27 “debt collector” as defined by 15 U.S.C. § 1692a(6).
28

ALLEGATIONS APPLICABLE TO ALL COUNTS

8. Plaintiff is a natural person allegedly obligated to pay a debt asserted to be owed to a creditor other than Defendant.

9. Plaintiff's alleged obligation arises from a transaction in which property, services or money was acquired on credit primarily for personal, family or household purposes, is a "debt" as defined by 15 U.S.C. § 1692a(5).

10. At all times mentioned herein where Defendant communicated with any person via telephone, such communication was done via Defendant's agent, representative or employee.

11. In or around April of 2015, Defendant contacted Plaintiff in an attempt to collect a debt.

12. During a live conversation, Plaintiff informed Defendant that the alleged debt belongs to his spouse and unequivocally requested that further calls to Plaintiff's phone cease.

13. Defendant responded by offering Plaintiff a settlement on the alleged debt.

14. Plaintiff repeated his request that further calls cease and informed Defendant that it needed to contact his spouse.

15. In or around March of 2015, Defendant, despite Plaintiff's earlier request and for no legitimate purpose other than to harass and annoy Plaintiff, again contacted Plaintiff regarding his spouse's alleged debt.

1 23. The foregoing acts and/or omissions of Defendant constitute violations of
2 the FDCPA, including every one of the above-cited provisions.

3
4 24. Plaintiff has been harmed and is entitled to damages as a result of
5 Defendant's violations.

6
7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff prays for judgment against Defendant for:

- 9 A. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
10 B. Statutory damages of \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A);
11 C. Costs of litigation and reasonable attorneys' fees pursuant to 15 U.S.C.
12 § 1692k(a)(3);
13 D. Punitive damages; and
14 E. Such other and further relief as may be just and proper.
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18 **TRIAL BY JURY DEMANDED ON ALL COUNTS**

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20
21 DATED: July 15, 2015

TRINETTE G. KENT

22 By: /s/ Trinette G. Kent
23 Trinette G. Kent, Esq.
24 Lemberg Law, LLC
25 Attorney for Plaintiff, Douglas Lee
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